

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10986 NG

ULYSSES RODRIGUEZ CHARLES,  
Plaintiff,

v.

CITY OF BOSTON, et. al.,  
Defendants.

**DEFENDANTS STANLEY BOGDAN AND THE CITY OF BOSTON'S MOTION  
TO DISMISS PURSUANT TO FED. R. CIV. P. 12(C)**

Defendants Stanley Bogdan and the City of Boston move pursuant to Fed. R. Civ. P. 12(c) to dismiss the plaintiff, Ulysses Rodriguez Charles's complaint because the claims are barred by the applicable statute of limitations. Accordingly, the complaint fails to state a claim upon which can be granted and judgment should enter for the defendants.

In support of this motion, the defendants submit a memorandum of law.

WHEREFORE the defendants, Stanley Bogdan and the City of Boston, move this Honorable Court to dismiss all claims against them as contained in the plaintiff's complaint.

REQUEST FOR ORAL ARGUMENT

Respectfully submitted,

DEFENDANTS, STANLEY BOGDAN AND  
CITY OF BOSTON,  
Merita A. Hopkins  
Corporation Counsel

By their attorney:

/s/ Thomas R. Donohue  
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Dated: December 12, 2005